

IN THE UNITED STATES PATENT OFFICE

In re Application of: Stuart Anthony Green, et al.)	Confirmation No.:	4890
)		
Serial No.: 10/727,069)	Examiner:	Dang, Hung Q.
)		
Filed: December 02, 2003)	Group No.:	2621
)		
For: DATA PROCESSING SYSTEM AND METHOD)		

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

DECLARATION UNDER § 1.132

Dear Sir:

I, an undersigned inventor of the above-identified patent application, hereby declare the following:

I am a professional in and expert in the field of the above identified patent application, namely interactive video distribution systems, and more specifically video coding. I am currently CEO of ZOO Digital and have worked for the company for nine years during which time I have been heavily involved in the development and distribution of interactive video and audiovisual products. As such, I am competent to judge the ordinary skill in the art.

For the convenience of reference, claim 47 of the above identified patent application was amended in the response of January 21, 2010 to read as follows:

47. (Currently Amended) A method of generating a random number associated with a user initiated interruption of a video sequence, comprising:
sequentially presenting to a user a plurality of group-of-picture ("GOP") structures **of an MPEG standard** collectively providing a first video sequence, each group-of-picture structure having a predetermined seed component and a navigation component;
in response to a user initiated interruption during the presentation of a GOP structure, receiving the seed component and the navigation component from the interrupted GOP structure;
providing a random number based at least in part on the seed component; and
linking or jumping to a second video sequence identified by the navigational component.

Claims 57, 67 and 77 were similarly amended with respect to reciting "of an MPEG standard" with respect to the group-of-picture ("GOP") structures.

One of ordinary skill in the art will appreciate that a group-of-pictures, aka GOP, is a well understood and defined structure. Furthermore, those skilled in the art of will appreciate that with respect to video coding there is only one interpretation for a structure identified as a group-of-pictures.

Moreover, with respect to the art of video streaming a group-of-pictures, GOP, is understood with respect to the Moving Picture Experts Group, "MPEG" standards for audio and video compression and transmission. At present MPEG-1, MPEG-2 and MPEG-4 are the current and most common standards each of which use the same convention for GOP. More specifically, a GOP consists of non-predictive reference frame (I-frames or I-Picture) and predictive delta frame (B-Frame / B-Picture and P-frames / B-picture) which provide motion compensated difference information, e.g., image changes, from the preceding I-frame or P-frame, the B- and P-frames being inseparable from the I-frame.

In other words, the GOP is the structure actually providing a video sequence (e.g., physical data), the I-frame containing the full image and the B-frame and P-frame providing the changes to the full video image from frame to frame. The GOP is clear and distinct from other video coding elements, such as Video Objects, known as VOBs, that are constructed by combining a string GOPs.

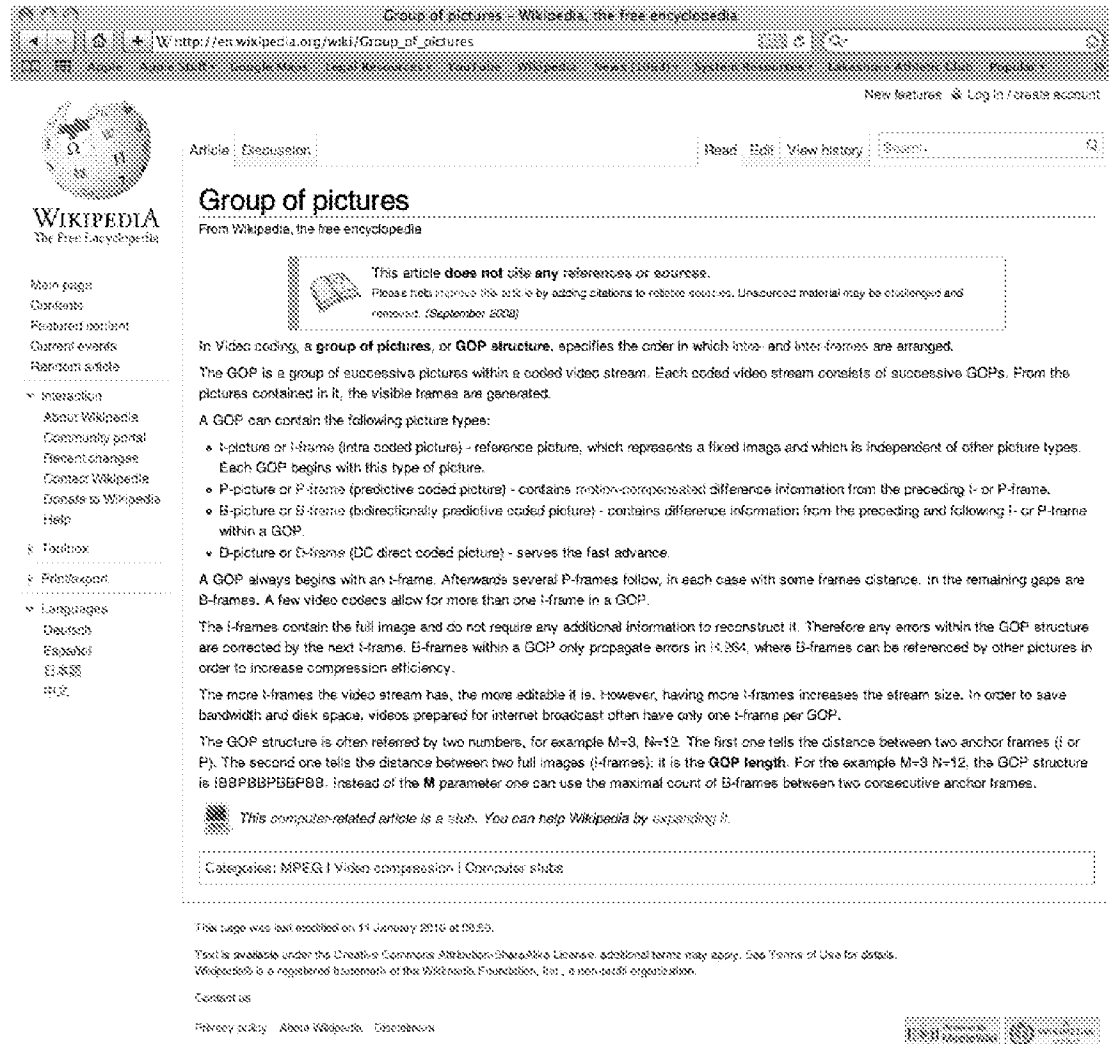
In short, in the context of this art, whether explicitly stated with respect to an MPEG standard, or implicitly understood as such, those skilled in the art can, do and will appreciate the plane meaning of "group-of-picture ("GOP") structures" as set forth above.

This understanding of "group-of-picture ("GOP") structures" is also reviewed in "DVD Demystified, 3rd Edition" by Jim Taylor, Mark R. Johnson and Charles G. Crawford, Mc Graw Hill, 2006, stating in the Glossary on page G-16:

"GOP Group of Pictures. In MPEG video, one or more I Pictures followed by P and B Pictures. A GOP is the atomic unit of MPEG video access. GOPs are limited in DVD-Video to maximums of 18 frames for 525/60 and 15 frames for 625/50."

The GOP is also discussed in Chapter 9 Application Details, pages 9-11 through 9-12 of the same reference.

This view is further reinforced by Wikipedia which provides one and only one definition for "group of pictures",



The present application is clearly presenting "an interruptible or skipable video sequence **102** having a number of group-of-picture structures GOP1 to GOP N." ¶ 017. The application further states, "Advantageously, embodiments of the present invention allow a DVD implementation independent random number generator to be realized that is not beset with at least some of the above mentioned problems {players with deficient RND implementation}. ¶ 008. Other statements are provided as well which further solidify an understanding that the present invention relates to interactive video distribution systems, and more specifically video coding in the context of which,

"group-of-picture ("GOP") structures" and even more specifically "group-of-picture ("GOP") structures of an MPEG Standard" as presented in the claims is clearly understood by those of ordinary skill in the art.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Respectfully submitted,

DATE: 11th June 2010



Stuart Anthony Green